

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JONATHAN BABCOCK,

Plaintiff,

v.

PN ENTERPRISES-RICHARDSON, LLC
D/B/A BOXES TO GO, RAJESH
NARULA AND MELWIN
KAYAPURATHU, INDIVIDUALLY,

Defendants.

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Case No. 3:24-cv-1103

DEFENDANT’S UNOPPOSED MOTION TO EXTEND ANSWER DEADLINE

Defendants PN Enterprises-Richardson, LLC (“PN Enterprises”), Rajesh Narula (“Narula”), and Melwin Kayapurathu (“Kayapurathu”) (collectively “Defendants”), request an unopposed extension until June 24, 2024, to file a responsive pleading to Plaintiff Jonathan Babcock’s Original Complaint [Dkt No. 1] (“Complaint”), and state as follows:

1. Plaintiff filed his Complaint on May 8, 2024. Defendants were served with a copy of the summons and the Complaint via mail on May 15, 2024. Because the Complaint was served by mail, three days are added to the answer deadline. Fed. R. Civ. P. 6(d). Defendants’ deadline to file their answer or otherwise respond to Plaintiff’s Complaint is, therefore, June 10, 2024. Fed. R. Civ. P. 12(a); Fed. R. Civ. P. 6(d).

2. Pursuant to Federal Rule of Civil Procedure 6(b)(1), for good cause, the Court may enlarge the period of time within which Defendants must serve their responsive pleadings.

3. There is good cause for an extension of time to respond in this case because both Parties have expressed an interest in exploring a potential resolution before pursuing continued litigation.

4. Plaintiff is not opposed to the relief sought in this Motion.

5. Accordingly, Defendants respectfully request that this Court extend the deadline for Defendants to file their answer or other responsive pleading to Plaintiff's Complaint until June 24, 2024. This is Defendants' first request for an extension of the deadline to file their answer or other responsive pleading to Plaintiff's Complaint.

6. This motion is brought in good faith, not for purposes of delay, and will not prejudice any party to this action.

WHEREFORE, Defendants respectfully request that the Court extend the deadline to file their answer or other responsive pleading to Plaintiff's Complaint until June 24, 2024.

Respectfully submitted,

By: /s/ Mark D. Temple

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ATTORNEY-IN-CHARGE FOR
DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Plaintiff regarding the relief sought in this Motion and that Plaintiff's counsel is not opposed to the relief requested herein.

/s/ Mark D. Temple

Mark D. Temple

CERTIFICATE OF SERVICE

The undersigned certifies that on this the 10th day of June, 2024, a true and correct copy of the foregoing Motion was electronically filed with the Court and made available to all counsel of record via the Court's ECF system.

/s/ Mark D. Temple

Mark D. Temple